

July 20, 2006

Ms. Mary Rupp, Secretary of the Board
National Credit Union Administration
775 Duke Street
Alexandria, VA 22314-3428

Re: Comments on Proposed Rule Part 740

Ms. Rupp:

We appreciate the opportunity to provide our comments regarding NCUA's proposed changes to the rules regarding insurance coverage and the display of the official advertising sign.

While complying with the proposed changes appears fairly simple, we believe the time period for complying with the display of the revised sign should be reconsidered. We agree that 60 days represents an adequate time to place new signs at our branches, on our internet site, or into new printed publications. However, replacing the stock of printed materials within the 60 day time frame presents a costly endeavor. Many of the publications which have the logo are ordered in large quantities to help control costs. Current economic conditions have already impacted many credit unions who are working diligently to maintain acceptable financial ratios. Requiring credit unions to endure the expense of discarding and replacing otherwise acceptable documents could have a measurable financial impact on many credit unions.

We would request the Board allow credit unions at least one year from the effective date of the revisions to use existing supplies of printed materials before any penalties are imposed.

Sincerely,



Alan Pughes
President/CEO